



"I will stand for my client's rights.  
I am a trial lawyer."  
—Ron Motley (1944–2013)

28 Bridgeside Blvd.  
Mt. Pleasant, SC 29464  
o. 843.216.9000 f. 843.216.9450

**Robert T. Haefele**  
*Licensed in DC, NJ, NY, PA, SC*  
direct: 843.216.9184  
rhaefele@motleyrice.com

**Via ECF**

April 21, 2022

The Honorable George B. Daniels  
United States District Court  
Southern District of New York  
Daniel P. Moynihan U.S. Courthouse  
500 Pearl Street  
New York, NY 10007

The Honorable Sarah Netburn  
U.S. Magistrate Judge  
United States District Court  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

**Re: In re Terrorist Attacks on September 11, 2001  
Dkt. No. 03-md-1570**

Dear Judge Daniels and Magistrate Judge Netburn:

As required by the Court's October 28, 2019 Amended Order Approving Notice to Conform, Short Form Complaints, and Notices of Amendment (ECF No. 5234), we submit this letter on behalf of the plaintiff in the following case, who has filed a Short Form Complaint against the Islamic Republic of Iran, and write to request that the action be made a part of this multi-district litigation (03-md-1570):

- *Lisa Ortiz as Personal Representative of the Estate of Angel R. Ortiz, v. Islamic Republic of Iran*, civil action no. 22-cv-3100;

We have also filed a Related Case Statement on the civil docket in this case, explaining that the newly filed case is related to the multidistrict litigation captioned as *In re Terrorist Attacks on September 11, 2001*, 03-md-1570 (GBD)(SN) ("MDL 1570").

Respectfully,

MOTLEY RICE LLC

By: /s/ Robert T. Haefele  
ROBERT T. HAEFELE

cc: All Counsel of Record via ECF